



UNITED STATES OF AMERICA
Federal Trade Commission
Washington, D.C. 20580

Division of Financial Practices
Bureau of Consumer Protection

VIA CM/ECF

April 17, 2024

Hon. Sarah L. Cave
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
Courtroom 18A
500 Pearl Street
New York, NY 10007

RE: *Federal Trade Commission v. Voyager Digital, LLC, et al.*, No. 1:23-cv-08960-GHW-SLC (S.D.N.Y.)

Joint Letter on the Status of Discovery

Dear Magistrate Judge Cave:

Pursuant to the Court’s March 19, 2024 Order, the Federal Trade Commission (“FTC”) and Defendant Stephen Ehrlich and Relief Defendant Francine Ehrlich (together with the FTC, “the parties”) respectfully submit the following report.

The parties have exchanged discovery requests pursuant to the Joint Report of Rule 26(f) Conference and Case Management Plan order. The parties exchanged written responses and objections to requests for interrogatories and document requests and the FTC made an initial production of documents on March 18, 2024. The Ehrlich Defendants made an initial production of documents on April 5, and on the same date, the parties served initial requests for admissions.

The parties have exchanged letters outlining their positions as to alleged discovery deficiencies and have scheduled periodic meet and confer calls to discuss and resolve outstanding issues. Consistent with the February 20, 2024 Electronic Discovery Order, the parties are also negotiating search terms to identify electronic communications and data responsive to the FTC’s discovery requests. The parties continue to make supplemental productions responsive to the discovery requests.

The parties are not aware of any issues requiring the Court’s attention at this time, but should the exchange of discovery lead to any issues, the parties will attempt in good faith to resolve the issues, and if unable to, will bring them to the Court’s attention.

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Respectfully submitted,

FOR PLAINTIFF:

/s/ Mark Glassman

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